

**Case No. 4:20-cv-00959-P**

V.

**DRUIEN, INC. D/B/A LAWTON  
AUTO AUCTION A/K/A LAWTON  
CACHE AUTO AUCTION, LISA  
DRUIEN, MICHAEL VERNON  
GARRISON D/B/A ROCK HILL  
USED CARS, AND AUSTIN  
MICHAEL GARRISON A/K/A MIKE  
GARRISON D/B/A AUSTIN  
FINANCIAL SERVICES,  
Defendant.**

**DEFENDANTS' DRUIEN, INC. D/B/A LAWTON AUTO AUCTION A/K/A  
LAWTON CACHE AUTO AUCTION AND LISA DRUIEN RULE 26(A)(1)  
DISCLOSURES**

**NOW COME** Defendants' Druien, Inc. d/b/a Lawton Auto Auction a/k/a Lawton Cache Auto Auction and Lisa Druien, named Defendants in the above-entitled and numbered cause, (collectively hereinafter "Defendants") and file this Initial Disclosure in accordance with Federal Rule of Civil Procedure 26(a)(1). Defendants will supplement their disclosures if needed and as required by federal and local rules.

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subject of the information.
  - a. NextGear Capital, Inc. c/o Padfield & Stout, LLP 420 Throckmorton Street, Suite 1210 Fort Worth, Texas 76102, (817) 338-1616

- i. Plaintiff in the current lawsuit
- b. Automotive Finance Corporation c/o Padfield & Stout, LLP 420 Throckmorton Street, Suite 1210 Fort Worth, Texas 76102, (817) 338-1616
  - i. Plaintiff in the current lawsuit
- c. Employees and officers of Automotive Finance Corporation c/o Padfield & Stout, LLP 420 Throckmorton Street, Suite 1210 Fort Worth, Texas 76102, (817) 338-1616
  - i. Have knowledge concerning the allegations made by Plaintiffs.
- d. Employees and officers of NextGear Capital, Inc. c/o Padfield & Stout, LLP 420 Throckmorton Street, Suite 1210 Fort Worth, Texas 76102, (817) 338-1616
  - i. Have knowledge concerning the allegations made by Plaintiffs.
- e. Druen, Inc. d/b/a Lawton Auto Auction a/k/a Lawton Cache Auto Auction c/o Bailly & Galyen, 1300 Summit Ave., Ste. 650, Fort Worth, Texas 76102, (817) 276-6000
  - i. Defendant in the current lawsuit
- f. Employees and officers of Druen, Inc. d/b/a Lawton Auto Auction a/k/a Lawton Cache Auto Auction c/o Bailly & Galyen, 1300 Summit Ave., Ste. 650, Fort Worth, Texas 76102, (817) 276-6000
  - i. Have knowledge of the operations, management, and procedures of Druen Inc. d/b/a Lawton Auto Auction a/k/a Lawton Cache Auto Auction
- g. Lisa Druen c/o Bailly & Galyen, 1300 Summit Ave., Ste. 650, Fort Worth, Texas 76102, (817) 276-6000
  - i. Defendant in the current lawsuit
- h. Emmett Druen, 4NW Heatherstone Drive, Lawton, Oklahoma 73505
  - i. Has knowledge concerning the operations, management, and procedures of Druen Inc. d/b/a Lawton Auto Auction a/k/a Lawton Cache Auto Auction
- i. Austin Michael Garrison, 4658 I30 E., Sulphur Springs, Texas 75482
  - i. Pro Se Defendant in the current lawsuit

- j. Michael Vernon Garrison, 549 I-30 E, Sulphur Springs, Texas 75482
  - i. Pro Se Defendant in the current lawsuit
  - k. All witness identified by Plaintiffs' or Michael Vernon Garrison, or Austin Michael Garrison in the above captioned lawsuit
- 2. A copy of , or description by category of location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.
  - a. None at this time. Defendant will supplement.
- 3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.
  - a. Defendants are not claiming damages at this time.
- 4. For inspection and copying under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.
  - a. None known

Defendants reserve their right to amend these Initial Disclosures pursuant to the Federal Rules of Civil Procedure.

Respectfully submitted,

Bailey & Galyen  
1300 Summit Avenue  
Suite 650  
Fort Worth, Texas 76102  
Tel. (817) 276-6000  
Fax. (817) 276-6010

By: /s/ Joseph M. Vacek  
Joseph M. Vacek  
Texas Bar No. 24039948  
Email: CivilLaw@galyen.com  
Attorney for Defendants Druien, Inc. d/b/a  
Lawton Auto Auction a/k/a Lawton Cache  
Auto Auction and Lisa Druien

**CERTIFICATE OF SERVICE**

I certify that on November 24, 2020 a true and correct copy the foregoing was served in accordance to the Federal Rules of Procedure.

VIA EMAIL

Christopher V. Arisco  
420 Throckmorton Street, Suite 1210  
Fort Worth, Texas 76102  
Attorney for Plaintiff

VIA U.S. MAIL

Michael Vernon Garrison individually and d/b/a Rock Hill Used Cars  
549 I-30 E  
Sulphur Springs, Texas 75482

VIA U.S. MAIL

Austin Michael Garrison individually and d/b/a Austin Financial Services  
4658 I-30 E  
Sulphur Springs, Texas 75482

By: /s/ Joseph M. Vacek  
Joseph M. Vacek